

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NO. 1:21 CV 00305-MR-WCM**

BRO T. HESED-EL,	)	
	)	
Plaintiff,	)	<b>RESPONSE BY DEFENDANTS</b>
	)	<b>ROBIN BRYSON, MISSION</b>
vs.	)	<b>HOSPITAL, INC. AND ANC</b>
	)	<b>HEALTHCARE, INC. TO</b>
	)	<b>PLAINTIFF’S REQUEST</b>
ROBIN BRYSON, et. al.,	)	<b>FOR JUDICIAL NOTICE</b>
	)	
Defendant.	)	

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NOW COME DEFENDANTS Robin Bryson, Mission Hospital, Inc., and ANC Healthcare, Inc. (collectively hereinafter “these Mission Defendants”), and respond to Plaintiff’s Request For Judicial Notice (hereinafter “Plaintiff’s JD Request”) as follows.

On March 8, 2022, the Plaintiff served upon these Mission Defendants a Motion To Withdraw Request For Judicial Notice (“hereinafter “Plaintiff’s Withdrawal Motion”), a copy of which is being filed herewith as Exhibit A. As soon as Plaintiff’s Withdrawal Motion has been filed with the Court, these Mission Defendants will be filing a consent thereto.

These Mission Defendants believe that the foregoing will render any substantive response by these Mission Defendants to Plaintiff’s J.D. Request unnecessary. However, should the Court fail to grant Plaintiff’s Withdrawal Motion,

these Mission Defendants request a 3-day extension of time following notice thereof within which to file a further response to Plaintiff's JD Request.

Respectfully submitted this the 10<sup>th</sup> day of March, 2022.

/ s/ Richard S. Daniels

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N.C. Bar No. 8716

*Attorney for Defendants Robin Bryson,  
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Healthcare, Inc.*

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## **CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2022, I served the foregoing *Response By Defendants Robin Bryson, Mission Hospital, Inc. and ANC Healthcare, Inc. To Plaintiff's Request for Judicial Notice* by electronically filing same with the Clerk of Court using the CM/ECF system and by depositing a copy, contained in a first-class postage-paid wrapper, into a depository under the exclusive care and custody of the United States Postal Service, addressed as follows:

**Bro. T. Hesed-El  
c/o Taqi El Agabey Mgmt.  
30 N. Gould Street, Suite R  
Sheridan, WY 82801**

A courtesy copy will be emailed to the Plaintiff at: [teamwork3@gmail.com](mailto:teamwork3@gmail.com).

This the 10<sup>th</sup> day of March, 2022.

/ s/ Richard S. Daniels

N.C. Bar No. 8716

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